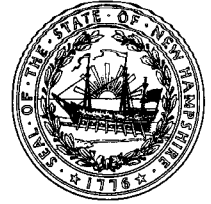




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

October 4, 2006

**CERTIFIED MAIL**  
**7000 1670 0001 2907 8521**  
**RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY**  
**No. WMD 06-023**

Bob Bauman, Plant Manager  
Timken Super Precision MPB  
P.O. Box 547  
Keene, NH 03431-0547

**Re: Timken Super Precision MPB, Plant #2**  
**32 Optical Avenue**  
**Keene, New Hampshire**  
**EPA ID # NHD986471027**

Dear Mr. Bauman:

On June 8, 2006, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Timken Super Precision MPB ("Timken") in Keene, New Hampshire. The inspection included Plant #1 located at 7 Optical Avenue and Plant #2 located at 32 Optical Avenue. The purpose of the inspection was to determine Timken's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection, the following deficiencies in your hazardous waste management program were documented at Plant #2:

1. Env-Wm 507.01(a)(3) - Storage Requirements

At the time of the inspection, one (1) 55-gallon container of hazardous waste aerosols stored in the 90-day hazardous waste storage area was not closed. See the attached Hazardous Waste Container Inventory ("Inventory").

Env-Wm 507.01(a)(3) requires generators to ensure that containers storing hazardous waste be closed at all times, except when waste is being added to or removed from the containers.

DES requested Timken to ensure that containers storing hazardous waste remain closed at all times, except when adding waste to or removing waste from the containers.

*At the time of the inspection, Timken personnel closed the container of hazardous waste aerosols. No further action is required.*

2. Env-Wm 509.02(a)(5) – Contingency Plan Requirements

At the time of the inspection, a review of Timken's contingency plan revealed that portions of the contingency plan were incomplete. Specific deficiencies are listed in the attached Contingency Plan Module.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requests that Timken revise and update its contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module and submit a copy of the revised portions of the contingency plan to local authorities and to DES.

3. Env-Wm 509.02(b) – Emergency Posting

At the time of the inspection, the emergency posting next to the telephone, nearest to the 90-day hazardous waste storage area, failed to document the location of fire extinguishers, spill control material, and alarms.

Env-Wm 509.02(b) requires that full quantity generators post a list of the steps to take if an emergency occurs and the following emergency numbers at the nearest telephone to the hazardous waste storage area:

- a. The emergency coordinators (home and office);
- b. The fire department, police department, and State of New Hampshire and local emergency response teams that may be called upon to provide emergency services, unless the facility has a 24-hour response team designated to provide emergency services whose number is posted; and
- c. The location of fire extinguishers and spill control material, and if present, fire and internal emergency alarms.

DES requests that Timken post the required information at the nearest telephone to the 90-day hazardous waste storage area.

4. Env-Wm 509.03 – Satellite Storage

At the time of the inspection, Timken was handling one (1) 55-gallon container of hazardous waste labeled as "hazardous waste-ECD waste D007," located in the X-Ray Area, as a satellite storage container. The location of this container did not meet the definition of "at or near the point of generation" (see the attached Inventory).

Env-Wm 509.03 requires that all satellite storage containers be located at or near any point of generation where the wastes initially accumulate and be under the control of the operator of

the process generating the waste.

DES requested that Timken manage the container of hazardous waste, labeled as “hazardous waste-ECD waste D007,” located in the X-ray Area, according to the requirements of Env-Wm 509.02 (*i.e.*, full storage area regulations). Alternatively, Timken was given the option of managing the container at the point of generation according to the requirements of Env-Wm 509.03.

*In a June 12, 2006 email, Neil Henry, Timken Maintenance Manager, stated that the container had been moved to an area adjacent to the point of generation. No further action is required.*

5. Env-Wm 807.06(b)(7) – Standards for Generators of Used Oil

At the time of the inspection, Timken had not performed an adequate used oil determination for the “straight oil” generated in Plant #2, which is managed as a “used oil for recycle.”

Env-Wm 807.06(b)(7) requires generators to conduct an initial used oil determination by analyzing it for all of the parameters specified in Env-Wm 807.02 and Env-Wm 807.03 (exclusive of PCB’s if no source of PCB’s is present).

DES requests that Timken conduct an initial used oil determination for the straight oil according to the parameters outlined in Env-Wm 807.02 and Env-Wm 807.03; and provide the results of the used oil determination to DES.

6. Env-Wm 1102.03(c) and Env-Wm 1112.03(a) – Universal Waste Container Requirements

At the time of the inspection, one (1) container of universal waste lamps was not closed (see the attached Inventory).

Env-Wm 1102.03(c)(1) requires universal waste containers to be closed, except when universal waste is being added to or removed from the container.

DES requested Timken to ensure that all containers of universal wastes are closed, except when universal waste is being added to or removed from the container.

*In the June 12, 2006 email, Neil Henry stated that the container of universal waste lamps had been closed. No further action is required.*

DES believes the remaining portion of the cited deficiencies can be corrected and **a report describing the corrective measures taken by Timken can be submitted within thirty (30) days of receipt of this letter.** Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Timken including issuing an order requiring that the deficiencies be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may re-inspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may be pursued for any or all violations observed during this or subsequent inspections of the facility.

The written report as requested above should be addressed as follows:

Robert Bishop, Waste Management Specialist  
DES/WMD  
P.O. Box 95  
Concord, NH 03302-0095

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at (1-866) HAZ-WAST (in-state only) or (603) 271-2942.

*Timken Super Precision MPB – Plant #2*  
*Letter of Deficiency No. WMD 06-0xx*  
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Should you have any questions regarding this letter, please contact Robert Bishop, or Tod Leedberg, RCRA Compliance Supervisor at 271-2942. Thank you for your continued cooperation.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'COPY' or a similar word, written over the word 'Sincerely,'.

John J. Duclos, Administrator  
Hazardous Waste Compliance Bureau  
Waste Management Division

cc: DB/RCRA/LOD/Archives  
Anthony P. Giunta, P.G., Director, WMD/ Paul L. Heirtzler, P.E., Esq., Administrator, WMP, WMD  
Gretchen Hamel, Administrator, DES Legal Unit  
Ralph Worden, Timken Manager of Safety, Training, and Environmental, PO Box 547, Keene, NH 03431

ec: JJD/SD

Enclosure: Hazardous Waste Generator Inspection Report